

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jamaal & Kashara Wheaton : Chapter 13  
Debtor : Case No.: 23-13586 PMM

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**RESPONSE TO MOTION FOR RELIEF FILED BY CAPITAL ONE AUTO FINANCE,  
CAPITAL ONE N.A.**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. By way of further response, if any payments have been missed post petition, Debtors are able and desirous creating a stipulation to enable Debtors to make Movant whole on any missed payments.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.

Wherefore, Debtor asks this Honorable Court to deny Movant's Motion for Relief of the Automatic Stay.

By: **Lazarus Law, LLC**  
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